



LUDLOW EXCHANGE, LLC.
New York, NY

	LUDLOW EXCHANGE, LLC DESIGNATED CONTRACT MARKET	Ticker CCFPROP
CONCACAF¹ PROP Class Certification of CONCACAF Prop Swaps Pursuant to CFTC Regulation 40.2(d) Includes: 1. Cover Letter (with Certifications) (Public)		

¹ CONCACAF is not affiliated or associated with Ludlow Exchange, LLC. Neither CONCACAF nor any of its affiliates sponsors, endorses, sells, promotes, approves, or is otherwise involved with this Contract or any other product offered by Ludlow Exchange. Any reference to CONCACAF is solely for purposes of identifying the underlying event and the applicable settlement source.

SUBMITTED VIA CFTC PORTAL

Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Class Certification of CONCACAF Prop Swaps Pursuant to Section 5c(c) of the Commodity Exchange Act and CFTC Regulation 40.2(d)

Dear Sir or Madam:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”), 7 U.S.C. § 7a-2(c), and Commission Regulation 40.2(d), 17 C.F.R. § 40.2(d), Ludlow Exchange, LLC (“Ludlow” or the “Exchange”), a registered designated contract market doing business as Novig, hereby certifies a class of CONCACAF Prop swaps (the “Class”) for listing on the Exchange.

A description of the Class and the certifications required by Regulation 40.2(d) follow:

The Previously Certified Contract. On September 28, 2026, the Exchange submitted and certified the CONCACAF Prop Contract pursuant to Commission Regulation 40.2(a), CFTC Submission No. 2609-2813-5637-80 (the “Previously Certified Contract”). The submission included the complete terms and conditions governing the Previously Certified Contract, including its pricing sources, formulas, procedures, and methodologies for determining reference values and payment obligations.

The Class. Each particular swap within the Class is an event contract based on the official attribution of a specified statistic recorded by a specified team or player in a specified soccer game played in a competition organized or administered by CONCACAF, or a designated segment of that game, measured against a stated line. Each swap will be governed by the terms and conditions of the Previously Certified Contract. The values assigned to <game>, <entity>, <stat>, <time period>, <comparison operator>, <count>, and <date> may vary among swaps within the Class and will be specified by the Exchange before the applicable swap is listed. No other term affecting the pricing source, calculation of the reference value, payment obligations, settlement procedure, or settlement currency may vary among swaps within the Class.

Identical Pricing Sources and Methodology. Each swap within the Class will use CONCACAF, the Governing Body of the competition in which <game> is played, as the Source Agency, and may be listed only on a <game> played in a competition organized or administered by CONCACAF. Each swap will apply the identical source hierarchy specified in the Previously Certified Contract, applied in order: (i) the official results publication of CONCACAF for the competition in which <game> is played; (ii) any other official channel maintained or expressly authorized by CONCACAF, or by FIFA where <game> is played in a FIFA competition administered by CONCACAF, such as ESPN, the Associated Press, Fox Sports, or the official broadcaster of <game>; (iii) the official records of any renamed, reorganized, or successor

governing body of that competition; and (iv) a result reported concordantly by at least two independent sources with a credible reputation regarding events relative to CONCACAF. The reference value for each swap is the official attribution of <stat> recorded by <entity> in <time period> of <game>, as recorded by the Source Agency. <entity> is either a soccer team or a soccer player officially entered in <game>, and <stat> is one of the official soccer statistics tracked by the Source Agency. Settlement follows the Payout Criterion: if the number of <stat> recorded by <entity> in <time period> of <game> is <comparison operator> <count>, the Member holding the YES side receives the Settlement Value, and if it is not, the Member holding the NO side receives the Settlement Value. “Above” means strictly greater than, “below” strictly less than, “exactly” equal to, “at least” greater than or equal to, and “between” within an inclusive range. On ties, where the Expiration Value is exactly equal to <count> and the swap is not quoted as an “exactly” market, the swap settles to Void and is resolved under the Fair Value Settlement Rule rather than to the NO side. Under the Ordered-Statistic and Tie Rule, where <stat> is expressed as a ranking or order, the ranking is determined by official play-by-play timing and, where two or more entities cannot be separated at the relevant position, each is deemed to occupy that position and each swap referencing a tied entity settles at the full Settlement Value without proportional reduction, unless the Contract Title expressly provides for proportional (dead-heat) settlement, in which case each such swap settles at a Yes value equal to the Settlement Value divided by the number of tied entities, rounded down to the nearest Minimum Tick, and a No value equal to the Settlement Value minus that Yes value. Each swap settles on an unequivocally determined Expiration Value under the Expiration Value Determination Rule. Under the Non-Participation Rule, a player <entity> must start and record playing time in <game>, a substitute entering after Commencement does not have action, and a failure to participate settles the swap to Void; that Rule does not apply where <entity> takes the form “Any” or “None.” Under the Partial Participation Rule, a starting player who records playing time but is thereafter removed does not cause a Void, and the Expiration Value is determined on the official statistics recorded for that player in <time period>. Where a swap settles to Void—including under the Non-Participation Rule, the Season and Tournament Truncation Rule, the Scheduling and Postponement Rule, the Format Change Rule, the Forfeit Rule, the Venue Rule, the No Result and Data Availability Rule, the Extraordinary Circumstances Rule, or the General Market Suspension Rule—or where any other provision otherwise provides for settlement at fair value, the swap will be resolved under the identical Fair Value Settlement Rule, including its Reference Time, Calculation Window, composite Fair Value Price sources, normalization methodology, Data Integrity exclusions, Fallbacks, and payment allocation. The determination of the Expiration Value is final under the Determination Finality Rule. Each swap will be denominated and settled in United States dollars.

Certifications. Pursuant to Section 5c of the Act and Commission Regulations 40.2(a)(3)(iv), 40.2(a)(3)(vi), and 40.2(d), the Exchange hereby certifies that:

- (i) each particular swap within the Class is based upon an excluded commodity specified in Commission Regulation 40.2(d)(1), specifically an occurrence, extent of an occurrence, or contingency within Section 1a(19)(iv) of the Act;
- (ii) each particular swap within the Class is based upon an excluded commodity with an identical pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations;



LUDLOW EXCHANGE, LLC.

New York, NY

(iii) the pricing source, formula, procedure, and methodology for calculating reference prices and payment obligations in each particular swap within the Class are identical to those used in the Previously Certified Contract;

(iv) each particular swap within the Class is based upon an excluded commodity involving an identical currency, the United States dollar;

(v) each particular swap within the Class complies with the Act and the Commission's regulations thereunder; and

(vi) concurrently with the filing of this submission, the Exchange has posted on its public website at <https://www.ludlowexchange.com/filings> a notice of pending class certification and a copy of this submission.

Submission Timing. The Exchange has filed this submission electronically through the CFTC Portal and will not list or facilitate trading in any swap within the Class unless the Commission has received this submission by the open of business on the business day preceding the listing, as required by Commission Regulation 40.2(a)(2).

Sincerely,

Calvin Smith
Head of Markets
Ludlow Exchange, LLC